Anti-Bribery & Corruption Policy

Policy Owner	Executive Director of People and Governance
Approval Level	Audit and Risk Committee
Resident Input	n/a
Policy Review Due	November 2029
EIA Date	September 2026
Linked strategies/policies	• Anti-Fraud Policy; • Financial Regulations & Standing Orders; • Procurement Policy; • Risk Management Policy; • Whistleblowing Policy; • Disciplinary Policy; • Safeguarding Policy; • Staff Code of Conduct; • Board Members Code of Conduct; • Staff Induction Pack; • Contracts of employment, including terms and conditions.
Version	1
Date of Approval	September 2026

Contents

1. What this policy is for 3
What are the aims and objectives of this policy? 3
2. Who this policy applies to 4
3. Regulation and Legal Requirements 4
What the law says about organisations and bribery 4
4. What is Bribery and Corruption? 5
Receiving a Bribe 6
5. What We Will Do 6
What the biggest risks are 6
Examples of bribery and corruption 8
What happens if bribery or corruption is proven 9
6. Equality, Diversity and Inclusion 9
7. Who is responsible 9
Reporting Bribery or Corruption 13
8. Monitoring and Reporting 14
9. Glossary 14

1. What this policy is for

1.1 This policy explains how we deal with suspected or attempted bribery and corruption. It sets out what we expect from you and what happens if bribery or corruption is reported or discovered.

1.2 We're committed to:

- Reducing bribery and corruption – and taking firm action, including disciplinary, civil or criminal steps where needed.
- Doing the right thing – we follow the highest ethical standards and have a zero-tolerance approach to bribery and corruption.
- Working with the right people – we only work with organisations and individuals who share our values and do business with honesty and integrity. We carry out checks where appropriate to make sure anyone working for or with us can be trusted to do the right thing.

1.3 All colleagues are expected to:

- Follow our policies and procedures
- Stick to controls that reduce risk
- Help keep Southway Wythenshawe Homes's reputation safe

1.4 This policy should be read alongside the Code of Conduct for Colleagues and the Code of Conduct for Board Members.

What are the aims and objectives of this policy?

1.5 This policy is here to help you understand what bribery and corruption are, what to look out for, and what happens if they're suspected or discovered at Southway Wythenshawe Homes's.

1.6 What we want this policy to do

- Be clear about Southway Wythenshawe Homes's stance on bribery and corruption
- Make sure we're following the law and doing things properly

- Help colleagues and partners understand the risks, spot issues early, and know how to report them
- Provide clear ways to raise concerns so they're handled properly
- Set out a fair and effective process for dealing with suspected cases
- Take firm action when someone is found to have acted dishonestly

2. Who this policy applies to

2.1 This policy applies to everyone who works with or for Southway Wythenshawe Homes, including:

- All colleagues – whether permanent, temporary, apprentices or trainees
- Volunteers and involved residents
- Contractors, consultants and suppliers
- Business partners and agents acting on our behalf
- Board Members and directors across Southway Wythenshawe Homes and its subsidiaries

2.2 In this policy, we refer to all of the above as 'associated persons'.

3. Regulation and Legal Requirements

3.1 This policy supports compliance with the following regulations and legal requirements

- The Bribery Act 2010
- The Criminal Finances Act 2017
- The Economic Crime and Corporate Transparency Act 2023.

What the law says about organisations and bribery

3.2 Under the Bribery Act 2010, it's also an offence if an organisation fails to stop someone acting on its behalf from committing bribery.

3.3 To reduce this risk, organisations must have "adequate procedures" in place to prevent bribery before it happens.

3.4 At Southway Wythenshawe Homes, we expect everyone to act with honesty and integrity when doing business on our behalf. Colleagues and Board Members must complete an annual declaration of interests, including a nil declaration where applicable, and must submit an updated declaration as soon as a new actual, potential or perceived conflict arises.

3.5 We've put in place clear bribery and corruption prevention measures, following guidance from the Ministry of Justice. These are built around six key principles:

Principle	Definition
Proportionate, practical procedures	Our anti-bribery measures are tailored to fit how we work. They're realistic, risk-based, and focused on the areas where bribery risks are highest.
Strong leadership from the top	Our Leadership Team is fully committed to tackling bribery and corruption, and to building a culture where dishonest behaviour is never acceptable.
Regular risk checks	We carry out regular assessments to understand where bribery risks might arise—especially when working with contractors, partners or anyone acting on our behalf.
Background checks (due diligence)	We make sure anyone providing services for Southway Wythenshawe Homes is acting with honesty and integrity. That means carrying out proportionate checks before and during our working relationship.
Clear communication and training	We make sure everyone understands what bribery and corruption look like, what the rules are, and what to do if they spot something suspicious. Role-specific training will be provided where the nature of the work creates an increased bribery or corruption risk.
Ongoing monitoring and improvement	We regularly review our procedures to make sure they're still effective—and we update them when needed.

4. What is Bribery and Corruption?

4.1 Bribery and corruption happen when someone misuses their power or position for personal gain. Often this involves two or more people making a secret agreement—for example, paying money to a public official in return for a favour. Because it's hidden, corruption can be hard to spot.

4.2 The Bribery Act 2010 sets out clear rules to prevent bribery in both the public and private sectors.

4.3 Bribery can involve either giving or receiving something of value.

- Giving a bribe is when someone offers, promises, or gives money or another advantage to another person:
  - with the intention of getting them to act dishonestly, or
  - knowing or believing that accepting it would lead to dishonest behaviour.

Receiving a Bribe

4.4 A person commits an offence if they:

- Ask for, agree to receive, or accept money or another advantage:
  - Intending to act dishonestly in their role
  - where accepting it would itself be dishonest, or
  - as a reward for acting dishonestly.
- Act dishonestly in their role because they asked for, agreed to receive, or accepted money or another advantage.

4.5 Both the person offering the bribe and the person accepting it can be guilty, even if they are third parties.

5. What We Will Do

What the biggest risks are

5.1 The main areas where we face risks of bribery and corruption are:

- Procurement - how we buy works, goods and services
- Gifts and hospitality - what colleagues or Board Members may be offered or accept
- Facilitation payments - payments to speed up routine tasks that should be done anyway
- Donations - charitable or political contributions

5.2 These are the areas we currently see as the highest risk. But this list isn't exhaustive. Other parts of our work may also be exposed to bribery or corruption risks, so we keep them under review.

Risk	Commentary
Procurement	Because our main activities are developing and managing social housing, we regularly procure works, goods and services. This makes procurement one of the biggest areas of risk for bribery and corruption. If you're involved in procurement, you must: • Follow the rules set out in our procurement policy/rules, Financial Regulations and the Code of Conduct for Colleagues relating to suppliers • Make sure any new supplier, or any change to an existing supplier relationship, is properly checked (due diligence) • Ensure potential and existing suppliers know about our Anti-Bribery and Corruption Policy Board Members must follow the Code of Conduct for Board Members, to reduce the risk of bribery when making decisions about suppliers.
Gifts & Hospitality	We know that reasonable hospitality is sometimes part of doing business. The Bribery Act recognises this, so genuine and proportionate hospitality isn't banned by this policy. However, strict rules apply: • Colleagues must follow the Code of Conduct for Colleagues and Gifts & Hospitality Policy when offering or accepting gifts or hospitality. • Board Members must follow the Code of Conduct for Board Members (Acceptance of Gifts and Offers and Acceptance of Hospitality). • Gifts or hospitality must never be offered or accepted if the intention is to gain, or be seen to gain, an unfair advantage. If you're unsure about a gift or invitation, report it to the Company Secretary. We also keep a register of hospitality offered and received. This is formally reviewed every year by the Company Secretary and checked by internal auditors.
Facilitation Payments	Facilitation payments are bribes paid to officials to make them do something they're already required to do. At Southway Wythenshawe Homes: • We do not make facilitation payments • We do not accept facilitation payments

	• We prohibit them in every circumstance If you're ever concerned about a request for a facilitation payment, you must report it straight away to the Company Secretary.
Donations	At Southway Wythenshawe Homes: • We do not make political donations • We prohibit donations to political parties, whether made directly or in any way that could be seen as coming from us. As a registered charity, we do make donations for regeneration and charitable purposes within the Southway Wythenshawe Homes area. All charitable donations must: • Be made openly and transparently • Have no expectation of reward • Never be used to try to gain an advantage

Examples of bribery and corruption

5.3 Bribery and corruption can happen in many ways. Some examples include:

- Accepting a bribe from a resident in return for favourable treatment. For example, in housing allocation, repairs, maintenance or other services.
- Offering a bribe to a third party to secure better contractual or commercial terms or accepting one in return.
- Offering or accepting gifts from government officials, representatives, politicians or political parties.
- Giving or accepting gifts or hospitality during negotiations or tender processes, if it could be seen as influencing the outcome.
- Accepting a payment, gift or hospitality from a third party that you know (or suspect) is offered with the expectation of a business advantage in return.

5.4 This list isn't exhaustive. Bribery and corruption can take many forms, and risks may appear in different parts of our work. That's why it's important for all colleagues, Board Members and associated persons to stay alert, recognise potential risks, and speak up if something doesn't feel right.

What happens if bribery or corruption is proven

5.5 Bribery and corruption are serious offences, and the consequences reflect that. Depending on what's happened, penalties can include:

- **Disciplinary action**
  If a colleague is found to have committed bribery or corruption, action will be taken under our Disciplinary Policy. This could include dismissal.
- **Criminal penalties under the Bribery Act 2010**
  Individuals can face up to 10 years in prison and/or an unlimited fine. Companies can also face unlimited fines.
- **Penalties under the Economic Crime and Corporate Transparency Act 2023 (ECCTA 2023)**
  Organisations can face unlimited fines if they fail to prevent bribery or certain economic crimes by senior managers. Individuals, including senior managers, remain personally liable for offences and face the same penalties as under the Bribery Act.

6. Equality, Diversity and Inclusion

6.1 An Equality Impact Assessment (EIA) was completed 09th September 2026. There were no actions from this.

7. Who is responsible

7.1 Because we all see different parts of how Southway Wythenshawe Homes works, each of us is in the best position to spot risks in our own area. Preventing bribery and corruption is a shared responsibility.

- **All colleagues**
  - Report any suspected or attempted bribery straight away
  - Raise concerns as early as possible—even if you're not sure something counts
  - If in doubt, ask your line manager or the Executive Director of People and Governance

- **Board**

  The Board is responsible for making sure we comply with this policy and meets its legal and ethical obligations around bribery and corruption.

- **Group Chief Executive**

  The Chief Executive is responsible for protecting our assets and making sure strong policies and procedures are in place to prevent bribery and corruption.

Role	Responsibility
Executive Director of People and Governance	The Executive Director of People & Governance leads on managing financial risks, including bribery and corruption. Their responsibilities include: • Building a clear picture of financial risks, including bribery and corruption • Making sure strong financial controls are in place and working properly • Reviewing and updating policies to keep them in line with financial crime laws • Promoting a culture of honesty and openness—encouraging colleagues to raise concerns • Working with external investigators when needed, such as the Serious Fraud Office (SFO), Police, National Crime Agency (NCA), HMRC, or the Crown Prosecution Service (CPS) • Maintaining a Fraud Register and providing an annual return to the Regulator of Social Housing. If an internal investigation is needed, the Executive Director of People & Governance will • Appoint someone to lead the investigation who is sufficiently senior, appropriately independent and not compromised by personal or professional relationships • Report the issue to the Chair of the Audit & Risk Committee and the Chair of the Group Board as appropriate. • Consider whether it is necessary to report to external agencies including (Internal or External Auditors, the Regulator, Police, or Insurers.
Internal and External Audit	If Internal or External Audit becomes aware of any suspected bribery or corruption, they must report it straight away to the Executive Director of People & Governance (or to the Chief Executive if the concern involves the Executive Director of People & Governance). Depending on what they find, they may need to:

	• Carry out further checks • Review systems in more detail • Support investigations by providing evidence—whether the investigation is led by Southway Wythenshawe Homes or an external body
People Team	The People Team plays an active role when an employee is suspected of being involved in bribery or corruption. From the very start of an investigation, they will: • Work closely with managers and the lead investigator • Make sure the Disciplinary Policy is followed fairly and consistently • Be consulted before any decisions are made about a colleague under suspicion If the allegation is serious and urgent action is needed, such as referral to the police, the Group Chief Executive must be consulted. At the recruitment stage, the People Team also: • Checks qualifications, memberships, and professional background to confirm integrity • Applies the same checks for temporary and fixed-term colleagues as for permanent staff If an investigation involves a Board or Committee Member, it will follow the procedures set out in the Code of Conduct for Board Members.
Managers	Managers play a key role in preventing bribery and corruption and in setting the right tone for their teams. They must: • Stay alert to unusual behaviour, events or transactions that could be signs of bribery or corruption • Make sure anti-bribery and corruption procedures are being followed every day • Promote a culture of openness, honesty and integrity within their teams • Ensure colleagues know the rules and where to get advice if they're unsure If a colleague raises a concern, managers must: • Listen carefully and thank them for speaking up • Not try to investigate the issue themselves • Report it immediately to the Executive Director of People & Governance Line managers also have a specific responsibility to make sure strong internal controls are in place and working effectively in their area. This includes paying close attention to colleagues working remotely, where risks may be higher.

	While preventing and detecting bribery and corruption is everyone's responsibility, managers are expected to lead the way and ensure systems are robust and consistently applied. As part of their responsibility, line managers must also: • Make sure new staff are introduced to the Code of Conduct during induction, and stress the importance of completing personal records and forms accurately • Ensure all colleagues they manage understand this policy and what's expected of them • Assess the types of bribery and corruption risks in their area of work • Put strong controls in place to reduce risks, including: - Clear roles and responsibilities - Regular supervisory checks - Staff rotation in key roles where possible - Separation of duties so no single person has full control over a process - Ongoing reviews to confirm controls are working effectively • Be familiar with this policy and the rules covering specific spending, payments and receipts • Identify posts that carry higher financial risk and manage them carefully • Make sure controls are being followed in practice • Feed into their director's wider review of risk and controls across the business
All Colleagues	Everyone has a role to play in protecting our organisation, whether that's our money, data, property, reputation or community. Colleagues are expected to: • Act with honesty, fairness and integrity at all times • Follow the rules of their professional bodies (where applicable) • Comply with all laws and Southway Wythenshawe Homes policies on ethical behaviour, procurement, expenses, conflicts of interest, confidentiality, and gifts and hospitality In practice, this means you should always: • Avoid anything that could be seen as dishonest or raise suspicion • Behave in a way that shows fairness and impartiality • Stay alert to the fact that others may try to deceive or influence you improperly All colleagues also have a duty to safeguard Southway Wythenshawe Homes's assets. Whether or not you handle cash, payments, receipts, or work directly with suppliers. This applies equally if you're working in the office, out in the community, or remotely.

Contractors	Relevant contractors must agree contractually to comply with this policy, before undertaking work on Southway Wythenshawe Homes's behalf.

Reporting Bribery or Corruption

7.2 If something doesn't feel right, speak up.

7.3 All colleagues, Board Members and associated persons are encouraged to raise concerns about suspected bribery, corruption or malpractice as early as possible. Even if you're not sure whether something counts, it's always better to check.

7.4 You can raise concerns by:

- Talking to your line manager
- Speaking directly to an Executive Director
- Following the steps in Southway Wythenshawe Homes's Whistleblowing Policy
- Asking the Executive Director of People & Governance for advice

7.5 We know it can feel difficult to speak up or refuse a bribe if you're worried about how others might react. But at Southway Wythenshawe Homes, we will support anyone who raises a genuine concern in good faith, even if it turns out to be a misunderstanding.

7.6 If you refuse to accept or offer a bribe, or if you report suspected wrongdoing, you will not be penalised for doing the right thing.

7.7 We're committed to making sure no one is treated unfairly for refusing to take part in bribery or for raising concerns in good faith.

7.8 This means you won't face:

- Dismissal or disciplinary action
- Threats or intimidation
- Any other negative treatment linked to speaking up

7.9 If you believe you've been treated unfairly after raising a concern, you should tell the Company Secretary straight away. If the issue isn't resolved and you're an employee, you can raise it formally through the Grievance Procedure.

8. Monitoring and Reporting

8.1 The Executive Director People & Governance is responsible for monitoring how well this policy is working and for making sure it stays fit for purpose.

8.2 They will:

- Regularly review its suitability and effectiveness
- Make improvements where needed
- Oversee regular audits of internal controls to ensure they are working as intended

8.3 This policy will be formally reviewed at least once every three years. It may be reviewed sooner if there are changes in the law, regulations, or official guidance that affect its provisions.

8.4 This policy doesn't form part of anyone's contract of employment, and Southway Wythenshawe Homes may amend it at any time.

8.5 We'll make sure the Anti-Bribery & Corruption Policy is easy for all Board/Committee Members, colleagues, and other relevant people to access.

8.6 The next review date for this policy is shown on the cover sheet.

9. Glossary

Term	Plain-English meaning
Associated person	Anyone working for, with or on behalf of the organisation, including colleagues, Board Members, volunteers, contractors, suppliers and partners.

Bribery	Offering, giving, requesting or accepting money or another benefit to influence someone to act dishonestly.
Corruption	Misusing power or a position for personal benefit.
Adequate procedures	Suitable measures and controls put in place to prevent bribery.
Conflict of interest	A situation where a personal interest could affect, or appear to affect, someone's work decisions.
Due diligence	Checks carried out to make sure a person or organisation is honest, suitable and trustworthy.
Facilitation payment	A payment made to an official to speed up a routine task they are already required to complete.
Gifts and hospitality	Gifts, meals, entertainment or other benefits offered or received through work.
Procurement	The process of buying works, goods or services.
Whistleblowing	Raising a genuine concern about suspected wrongdoing or malpractice.
Zero tolerance	Bribery and corruption are not accepted in any circumstances.